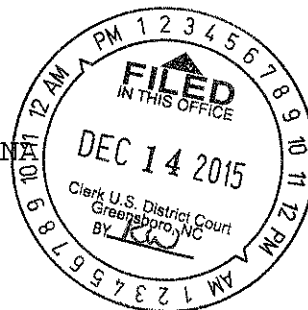


IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



UNITED STATES OF AMERICA :
 :
 v. : 1:15CR 422 -1
 :
 GARY LYNN BRADSHAW :

The Grand Jury charges:

COUNT ONE

On or about May 4, 2015, in the County of Rowan, in the Middle District of North Carolina, GARY LYNN BRADSHAW knowingly did distribute and attempt to distribute child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been mailed, shipped, and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate commerce by any means, including by computer; in violation of Title 18, United States Code, Section 2252A(a)(2)(A) and (b)(1).

COUNT TWO

On or about May 12, 2015, in the County of Rowan, in the Middle District of North Carolina, GARY LYNN BRADSHAW knowingly did distribute and attempt to distribute child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been mailed, shipped, and transported using any means and facility of interstate and foreign commerce, and in and

affecting interstate commerce by any means, including by computer; in violation of Title 18, United States Code, Section 2252A(a) (2) (A) and (b) (1) .

COUNT THREE

From in or about April, 2015, continuing up to and including in or about May, 2015, the exact dates to the Grand Jurors unknown, in the County of Rowan, in the Middle District of North Carolina, GARY LYNN BRADSHAW did knowingly possess materials which contained child pornography, as defined in Title 18, United States Code, Section 2256(8) (A), said child pornography containing an image that involved a prepubescent minor and a minor who had not yet attained 12 years of age, and which materials had been shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been shipped and transported in and affecting interstate and foreign commerce, including by computer; in violation of Title 18, United States Code, Section 2252A(a) (5) (B) and (b) (2) .

COUNT FOUR

From in or about April, 2015, continuing up to and including in or about May, 2015, the exact dates to the Grand

Jurors unknown, in the County of Rowan, in the Middle District of North Carolina, GARY LYNN BRADSHAW did knowingly access with intent to view material which contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), said image involving a prepubescent minor and a minor who had not yet attained 12 years of age, and which materials had been shipped and transported using any means and facility of interstate and foreign commerce, had been shipped and transported in and affecting interstate and foreign commerce, and had been produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; in violation of Title 18, United States Code, Section 2252A(a)(5)(B) and (b)(2).

FORFEITURE ALLEGATION

Upon conviction of one or more of the offenses alleged above, the defendant, GARY LYNN BRADSHAW, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253(a)(1) and (a)(3), all visual depictions described in Title 18, United States Code, Section 2252A, and all property, real or personal, used or intended to be used to commit or promote the commission of the offense of conviction, including but not

a. One HP Desktop Computer, serial number
4CS105093T; and

b. One SanDisk Cruzer Thumbdrive 4GB.

All in accordance with Title 18, United States Code,
Section 2253, and Rule 32.2, Federal Rules of Criminal
Procedure.

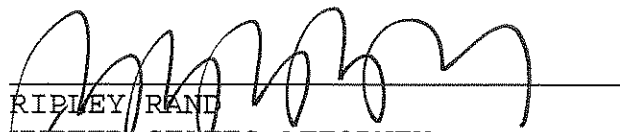
A TRUE BILL:



FOREPERSON

Frank J. Clark
for ELL

ERIC L. IVERSON
ASSISTANT UNITED STATES ATTORNEY



RIPLEY RAND
UNITED STATES ATTORNEY